

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SOPHIA BALOW, AVA
BOUTROUS, JULIA COFFMAN,
KYLIE GOIT, EMMA INCH,
SHERIDAN PHALEN,
MADELINE REILLY, OLIVIA
STARZOMSKI, SARAH
ZOFCHAK, TAYLOR ARNOLD,
AMANDA LING, and ELISE
TURKE, Individually and on behalf
of all those similarly situated,
Plaintiffs,

v.

MICHIGAN STATE
UNIVERSITY, MICHIGAN
STATE UNIVERSITY BOARD OF
TRUSTEES, SAMUEL L.
STANLEY JR. and BILL
BEEKMAN,
Defendants.

CIVIL ACTION NO.

DECLARATION

December 18, 2020

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DECLARATION OF MADELINE REILLY

I, Madeline Reilly, declare as follows:

1. I am 20 years old and understand the obligations of an oath.
2. I am currently enrolled at Michigan State University (“MSU”),
majoring in Kinesiology and minoring in Health Promotions.
3. I am in my Junior year at MSU.
4. I am a member of the women’s varsity swimming and diving team at MSU
and have been a swimmer on the team since my Freshman year.
5. I am a named plaintiff in this action. I make this declaration in support of
plaintiffs’ motion for preliminary injunction.
6. I am rattled and upset by the prospect that women’s swimming and diving
is being eliminated as a varsity sport at MSU.
7. The elimination of my sport has been so upsetting because I am having
something that I love, which means so much to me and those I care about
taken away from us.
8. I have not felt like myself since the cutting of Women’s Swimming and

Diving was announced. I have felt like I am just going through the motions and trying to keep my head above water. This is especially true where we have less ability to be supported by our teammates/friends, family and loved ones during this pandemic.

9. I feel abandoned by MSU, its athletic department. MSU did nothing to work with us to save the program despite requests by our team and alumni. I feel that the drive and determination of our current team and our alumni could have worked to arrive at a solution, but we were never given that opportunity by MSU.
10. I feel that I have been harmed personally and professionally by MSU's decision.
11. I am remaining at MSU and will not be transferring. I fear my credits will not necessarily transfer to another university and that may cause me to delay graduation and the start of a medical school education. Transferring would mean starting all over with new friends, new surroundings, and not necessarily a new team to join as I do not know what schools potentially have a spot on a team for me. Transferring would also mean paying additional money to a new university depending on scholarship availability.
12. I will lose some of my best friends (and teammates) due to transfers to other schools to allow us to continue our collegiate swimming career.

13. If MSU has its way, there will be no Women's Swimming and Diving team next year and if I remain at MSU, I will not have the opportunity to be a 4-year varsity letter athlete. This will also harm me professionally as a 4-year varsity athlete is invaluable on my resume and applications for employment and MSU is taking this from me.
14. I am currently involved in the student athlete advisory committee. I do not know if I am going to be able to be involved after my sport is cut. I cannot rely on the word of the Athletic Department as I feel lied to in the discussions revolving cutting my team. I am also a regular volunteer with Spartan Buddies, volunteering with pediatric patients at Sparrow Hospital. I was planning on "heading" the program after Erin Neely (the current head and another member of the MSU Women's Swimming and Diving team) graduates. Again, due to the cutting of my sport I don't know if I will be able to take this on. I would be devastated if these opportunities were taken away from me. It will also be a blow to the community and these children. The excitement of having a Big 10 athlete as a "buddy" is not one that can be easily replaced. MSU is taking an active, caring and interested group out of this program and these children's lives.
15. After I graduate from Michigan State, I plan on applying to medical school. This goal would not even be a thought if it were not for my time

as a student athlete at Michigan State. During freshman year, my training partner was a senior swimmer named Emily (“Emmy”) Brunett. Emmy was (and still is) one of the greatest role models in my life. She was studying Kinesiology with the hope of applying to medical school. Emmy taught me so many things my freshman year, but the most important was that if you set your mind to something, you can absolutely accomplish it. I had never thought I was capable of or cut out for the Pre-Med curriculum, but Emmy showed me perfection is never required to accomplish our dreams. Without teammates like Emmy, I would have never found what I believe to be my calling. All my teammates have helped to instill the belief in me that I can accomplish anything I set my mind to. They have shown me how to work as a team, even when it is not easy, which will set me up very well for the next chapter of my life.

16. This action by MSU has taken away leadership opportunities. It has taken away a motivational tool and something that allowed me to succeed not only in the pool but in all areas of my collegiate life, the classroom and community. Swimming on this team was hard but empowering. It made me want to excel in all aspects of my life - to be the best version of myself.
17. It feels that at times the Athletic Department has used the excuse that MSU is not best program in big 10 as a reason to eliminate our program. (The

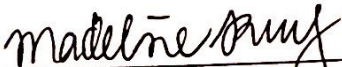
Big 10 is one of the best and most competitive Conferences for swimming and diving in the nation.) However, we have been told from before we set foot on campus that MSU was about athletic as well as academic success and being a contributing member of the MSU community. The Coaches told us that we can be anything we want to be and that we could choose any major because they wanted to make us into the best people we can be and that is more than just athletics. Athletic Director Bill Beekman has preached the idea of the student-athlete being these things. However, after the announcement of ending our program, this rings hollow.

18. This action by MSU is not just taking away our current team but it is creating a disconnect between the University and a deep and well-rooted alumni foundation.
19. The facilities and benefits provided to the Women's Swimming and Diving team were unequal to the facilities and benefits for many of the men's sports such as football and basketball. The drinking water at the facility was not fresh. It was often brown in color and smelled terrible. It was barely drinkable. To not have fresh water readily available for athletes is unthinkable. Further, our locker room and team room are incredibly small and in disrepair. We rarely have sufficient nutrition in our team rooms, rather we have to supply our own or travel to Jennison

the Men's Football and Basketball team often travel by plane to destinations we are required to drive. We have suffered these inequities to participate in a sport with love and to be a part of this incredible team and collegiate experience.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: December 28, 2020



Madeline Reilly
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